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Planning Inspectorate

By email only to: enquiries@planninginspectorate.gov.uk

29 May 2020

Dear Sirs

New Southwark Plan examination in public

We write further to your letter dated 20 April 2020 in respect of the above provisional local plan examination for the proposed New Southwark Plan. We advise, liaise with and represent a number of active community members on planning matters in Southwark.

We firstly wish to express our concern that we were only able to view a copy of this letter on 21 May 2020, which is the day after the response by Southwark Council was provided to the Inspectors and when it was uploaded on to the examination web page. It is appreciated that Southwark Council's resources are greatly stretched at this point but we do not believe this should have delayed the publication of the letter on the New Southwark Plan examination website so that all consultees, stakeholders and community members could see the content from the point the letter was sent to Southwark Council.

You will of course be aware that your letter dated 20 April 2020 raised several substantive issues with the submission version of the New Southwark Plan. We focus our initial concerns mainly on the points raised in respect of the consultation, however we request more time to seek advice and provide a full response to the entirety of the issues raised in this letter. We also raise consequent concerns with the proposed course of action suggested in the response from Southwark Council dated.

In respect of the adequacy of the consultation of the submission version of the New Southwark Plan, we are in agreement with your letter. We have questioned the methods of consultation and the overall clarity of the submission version of the New Southwark Plan at various points over the past three years.

Your letter raises numerous issues with the consultation process, including possible failures to provide the correct notices in respect of the submission version of the plan, and concerns that the Amended Policies Version was not consulted on in accordance with Regulation 3 (2) and 17 second (e) of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Local Plan Regulations') as it initially only permitted consultation responses on the Southwark Council Consultation website. We also have serious concerns that the Statement of Community Involvement referred to in Southwark Council's response to your letter was adopted 12 years ago in 2008, and

obviously takes no account of the restrictions necessary to the procedure of consultations in light of the impact and mitigation of coronavirus. These have the potential to seriously impact on the ability of more disadvantaged groups in the borough from taking part in the consultation, for example those who are shielding for an extended period.

In summary, one of our main concerns is that it simply will not be possible to have a meaningful consultation from June – September 2020 on the most important planning policy for at least the next ten years in Southwark. In our initial view, this will not result in legal compliance from the Local Plan Regulations and will give rise to the same issues raised in your 20 April 2020 letter in respect of consultation processes.

We would also like to notify you that the main Southwark Council office building is currently closed, and it is likely to remain closed throughout the proposed consultation period.

We request that your response to Southwark Council in respect of the proposed course of action be delayed in order for you to consider our substantive concerns, which we are currently seeking advice on, and will provide in the next few weeks with your kind permission and co-operation.

We look forward to hearing from you.

Yours faithfully

**Planning Voice, Southwark Law Centre
Southwark Planning Network**

cc. Programme Officer, New Southwark Plan Examination in Public, Southwark Council